

Monarch Teaching Technologies Vizzle Privacy Policy

Effective Date: April 24, 2017

Monarch Teaching Technologies, Inc. (“MTT,” “we,” or “us”) is in the business of providing to school districts, schools, teachers, parents, and students its Vizzle proprietary learning software and materials through its mobile application and website application, which includes, without limitation, all associated computer software, functionality, reporting tools, features, media, printed materials, and "online" or electronic documentation (collectively, the “App”). MTT takes very seriously the privacy of our individual teachers, students, parents, and school district administrators (individually, a “User” and collectively “Users”) who utilize the App. Transparency is of the utmost importance when it comes to privacy and data collection, and this Privacy Policy contains explanations regarding the types of personal information collected, how that information may be used or disclosed, and how to access, correct or change the information.

1. COLLECTION AND USAGE OF PERSONAL INFORMATION

The App provides a platform that enables schools and/or school districts to securely assign lessons to students, and allow parents, teachers, and school district administrators to track a student’s progress towards meeting certain Goals and Objectives (defined below).

Through the App we collect the following types of personal information for each User type.

School District Administrators: We ask for certain personal information when a school district administrator (such as a director of curriculum, technology administrator, principal, or other school district representative authorized by his or her respective school district to manage that school district’s administration of the App) registers a school or school district with MTT. This personal information includes, but is not limited to, first and last name, school name, school district, school email address, account name and password, and phone number. We may also use and retain personal information provided by a school district administrator, if the school district administrator contacts us with regards to our App or other services, or responds to emails or surveys.

Teachers: When a teacher registers to use the App, MTT may use and retain limited personal information, including first and last name, school and/or school district, email address, and account name and password.

Parents: When a parent registers to use the App, MTT may use and retain limited personal information, including first and last name, school and/or school district, email address, and account name and password.

Students: When a student registers to use the App (to create a student profile), MTT may use and retain limited personal information, including first and last name, school and/or school district, and account name and password. However, a last name is not required to use the App. If the student so desires, an initial could be used instead of the full last name. Most students also

have goals and objectives entered into the App that tie directly to his or her respective Individualized Education Program (“Goals and Objectives”). Moreover, some teachers will customize material in the App that is presented to students (“Custom Materials”). Custom Materials includes, but may not be limited to, creating material that identifies a student’s favorite colors, persons, places, or toys, as well as any images, audio, and video that are of the student or a student’s relatives, or of a student’s favorite things.

MTT regards all Users’ personal information to be confidential and does not utilize any personal information for any purposes other than to provide the App and any additional services to a school and/or school district.

MTT does not typically receive student personal information from a student, and instead receives student personal information from the student’s school district administrator, teacher, or parent. Each school and/or school district must confirm to MTT that it has obtained the appropriate parental consents, as needed, before the student is permitted to access the App. MTT has direct access to student personal information only as requested and directed by the school and/or school district, or for support or troubleshooting purposes, and access to this personal information is only for the purposes of supporting the App on the school’s and/or school district’s behalf. MTT will never directly access and view student personal information for any other purpose.

Students and/or parents should contact their teacher or school district administrator with any questions about the school’s use of technology service providers like MTT. In the case that either a student, teacher, or parent contacts MTT about the App, we will collect personal information only as necessary to respond to the request, and forward the request to the respective school district administrator.

We may automatically collect certain types of usage information when Users use the App. This information includes a User’s IP Address, Operating System version, characteristics of the browser or device, and interactions with the system (including, but not limited to, pages viewed, lessons copied, lessons played, login duration, and what help videos have been accessed).

CACHE:

Like many websites, MTT utilizes browser caching to improve the performance of the application. Types of data stored in a browser’s cache may include - but is not limited to - images, audio files, video files, and lesson data needed in order to properly display lessons to the user.

COOKIES:

Like many websites, MTT uses “cookies” on the App to improve its performance and enhance your experience. A cookie is a small text file which is placed on your device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. The web application can then tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Certain cookies may contain personal information – for example, if you click to “remember me” when logging in, a cookie may store

your account name and password. Most cookies won't collect personal information that identifies you, and will instead collect more general information, such as how Users arrive at and use the App.

Generally the cookies that are used on the App can be broken down into the following categories:

- Persistent Cookies - This type of cookie is saved on your device for a fixed period and is not deleted when the browser is closed. Persistent cookies are used where we need to remember who you are for more than one browsing session. For example, this type of cookie is utilized with our "Remember Me" checkbox, so that a User's account name and password are remembered for the next visit to the App. This type of cookie can also be used by browsers for local storage, and as such some App data may be present in the form of cookies, including - but not limited to - student interaction data such as time spent answering questions, correct responses, incorrect responses, and lessons played.
- Performance or Analytical Cookies - Performance cookies are used to analyze how the App is used and to monitor its performance, which allows us to improve your experience in using the App. These cookies help us to tailor the content of the App to reflect what the App Users find most interesting and to identify when technical issues with the App arises. We may also use this data to compile reports to help us to analyze how the App is used, what the most common issues, are and how we can improve the App.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services on the App may not work properly because we may not be able to recognize and associate you with your account(s).

Additionally, our legacy website application runs in Adobe Shockwave Flash, which requires the storage of App information to be handled via a "local shared object," which is similar to a browser cookie. Information on controlling Flash Player settings can be found via Adobe's web-site (at the time of writing this information can be found at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html).

The latest version of the VizZle Web application (nextgen.govizzle.com) runs on HTML5-based technology, and utilizes Intercom's services to help onboard and assist users in the application. Intercom's service agreement is listed below. Intercom services do not interact with students inside of the VizZle application, and we also do not provide any student information to Intercom.

Use of Intercom Services: We use third-party analytics services to help understand your usage of our services. In particular, we provide a limited amount of your information (such as your email address and sign-up date) to Intercom, Inc. (“Intercom”) and utilize Intercom to collect data for analytics purposes when you visit our website or use our product. Intercom analyzes your use of our website and/or product and tracks our relationship so that we can improve our service to you. We may also use Intercom as a medium for communications, either through email, or through messages within our product(s). As part of our service agreements, Intercom collects publicly available contact and social information related to you, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses, to enhance your user experience. For more information on the privacy practices of Intercom, please visit <http://docs.intercom.io/privacy>. Intercom’s services are governed by Intercom’s terms of use which can be found at <http://docs.intercom.io/terms>. If you would like to opt out of having this information collected by or submitted to Intercom, please contact us.

At this time MTT does not take any action based upon do not track requests.

2. LIMITS ON CONFIDENTIALITY

By using the App and sharing your personal information with us, you will have opted-in to our collection, disclosure and use of your personal information under this Privacy Policy.

We may use your personal information for the purposes of sending you registration information for the App, maintaining your account, customizing the App and/or material, processing your communications, and communicating with you about the App. We may also use personal information for auditing, research and analysis to operate and improve MTT’s technologies and services.

Further, when you send email communications to MTT, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.

Student personal information is used by MTT only for educational purposes and under the direction and discretion of the school, school district administrator, teacher, and/or parent(s).

We may also share your personal information in any of the following circumstances:

- (i) Student personal information. We may provide access to student personal information to authorized school district administrators, teachers, and parents within the student’s school district and/or school.

(ii) Third Party Businesses. We do not sell any of your personal information (including your name or e-mail address) to any companies or third parties. We may however provide your personal information to our trusted businesses or persons (“Third Party Businesses”) for the purpose of processing or storing personal information on our behalf, or for the purpose of analyzing usage of our App. These Third Party Businesses include, without limitation, third parties we use to assist us in our mission such as data center hosting providers and analytic firms. The personal information that we process or that is processed for us may be transmitted to and stored on the servers of Third Party Businesses. When we do disclose your personal information to others, it is subject to agreements that require those parties to process such personal information in compliance with this Privacy Policy, and in an appropriate confidential and secure manner.

(iii) Security. Due to the existing legal, regulatory and security environment, MTT may disclose aggregate level and/or personal information about its Users to protect the rights, property or safety of MTT, our customers, or the public, to prevent fraud or imminent harm, and in connection with providing for the security of our computer systems, computer network, telecommunications network, products and services.

(iv) Sale or Transfer of Business. We may sell or otherwise transfer your personal information to a successor of MTT in connection with an asset sale, acquisition, merger, consolidation, divestiture, stock sale, purchase of part or all of the assets of the business, or other corporate transaction, or by way of assignment (whether by operation of law or otherwise) in connection with any such or similar transaction or in connection with the administration of a bankruptcy estate. In the case of such event, MTT’s systems, technology, intellectual property, and data, including personal information, will become the property of the successor and will be subject to the successor’s Privacy Policy should they have one.

MTT may also facilitate the sharing of student personal information with Third Party Businesses when instructed and authorized to do so on behalf of the school district, school, or a parent. If this sharing occurs, this Privacy Policy applies to the App only and not to other services or third party applications. School districts, schools and parents should understand the privacy practices of any third party application or service prior to authorizing the sharing of any personal information.

3. STORING AND PROTECTING PERSONAL INFORMATION

Any personal information collected through the App is stored and processed in the United States. Any customers that reside outside of the United States consent to have personal information transferred to the United States.

MTT protects your personal information by using safeguards that MTT believes are appropriate to the sensitivity of the information. We maintain certain administrative, technical and physical safeguards to help protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal information. Each of our employees, subcontractors, or business partners who have access to your personal information is informed about our Privacy Policy for

protecting personal information.

MTT undertakes substantial efforts to protect the confidentiality of the personal information and other information it has collected about individual Users and, except as otherwise set forth in this Privacy Policy, we will not intentionally disclose this information to anyone outside MTT.

Except as otherwise set forth in this Privacy Policy, we restrict access to your personal information to employees, subcontractors, or business partners who need to know that information in order to perform their jobs or duties and provide services to you. We review our data collection, storage and processing practices and security measures, as well as physical security measures intended to guard against unauthorized access to systems where we store personal information, on a periodic basis.

If you use an account name and password to access the App, you are solely responsible for maintaining the secrecy of your password and/or account information. To ensure effectiveness of your password, we recommend that you do not disclose your account information or password to anyone.

4. CHOICES ABOUT YOUR PERSONAL INFORMATION

Your personal information is kept as accurately and completely as is necessary for the purposes for which it is to be used. You have the right to access, update, modify, amend or correct errors in your personal information directly through the App or by contacting MTT by email at support@MTT.com.

The App also features an administrative console that provides school district administrators and teachers the ability to access certain personal information by signing into the administrator console.

Student personal data is provided and controlled by each student's respective school district administrator(s), teacher(s), and/or parent(s). If you have any questions about reviewing, modifying, or deleting personal information of a student, please contact the appropriate school district administrator, teacher, or parent.

Following termination or deactivation of a school's account, MTT may retain school district administrator, teacher, parent, and student personal information and content for a commercially reasonable time for backup, archival, or audit purposes, or as directed by the school and/or school district.

Even after you have consented to MTT's collection and use of your personal information and submitted personal information to MTT through the App, you may opt-out of having your personal information collected or used by MTT by contacting MTT at support@MTT.com. However, by opting out you will no longer be able to use the App. Please note that in order to fulfill certain obligations, we may need to continue sending you notices or other important information concerning any services you request.

Anonymized or aggregated data may be maintained, including usage data, for analytics and

utilization statistics.

If you have any questions about how your personal information is managed, retained, or deleted, please contact support@MTT.com

5. FERPA

Users may be subject to the provisions of the federal law known as the Family Educational Rights and Privacy Act (“FERPA”). User’s use of the App and MTT’s use and/or transmission of student personal information as a result of User’s use of the App may be subject to the provisions of FERPA. In pertinent part, FERPA affords students certain rights with respect to their educational records. Such rights include the right to consent to disclosures of personal information contained in students’ educational records to third parties except in situations where FERPA (and its regulations) permit such disclosure without students’ consent. Users shall comply with all federal and state laws, including, without limitation, FERPA, respecting the disclosure of students’ personal information contained in student records. Users shall only transmit student personal information via the App in order to develop, validate or administer lessons, administer student aid programs, and/or improve instruction.

6. COMPLIANCE WITH LOCAL LAWS

This Privacy Policy is meant to guide MTT with respect to personal information collected from or about you by the App. While this Privacy Policy applies to personal information generally, the local laws, rules and regulations of jurisdictions that are applicable to MTT (“Local Laws”) may require standards which are stricter than this Privacy Policy and, in such event, MTT will comply with applicable Local Laws. Specific privacy policies may be adopted to address the specific privacy requirements of particular jurisdictions.

7. CONTACT US

If you have any questions about this Privacy Policy or the App, please contact us at support@MTT.com.

8. CHANGES TO OUR PRIVACY POLICY

MTT may modify or update this Privacy Policy from time to time. If we change the policy in a material manner, we will provide at least 30 days of notice so that there is sufficient time to evaluate the change in policy. The most current version of the policy can be found at: <https://www.monarchtt.com/privacy-policy/>

CONSENT:

YOUR KNOWLEDGE AND CONSENT ARE REQUIRED FOR THE COLLECTION, USE, OR DISCLOSURE OF YOUR PERSONAL INFORMATION. BY SUBMITTING YOUR PERSONAL INFORMATION TO MTT, YOU HEREBY CONSENT TO MTT’S COLLECTION, USE AND DISCLOSURE OF SUCH PERSONAL INFORMATION. IF YOU

DO NOT CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY, YOU SHALL NOT SUBMIT SUCH INFORMATION TO MTT.